

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE BRITANNIA BULK HOLDINGS : Master File No. 08-cv-09554(DLC)
INC. SECURITIES LITIGATION : This Document Relates To: All Actions

NOTICE OF MOTION FOR RELIEF FROM ORDER

PLEASE TAKE NOTICE THAT pursuant to Rule 60(b)(6), Fed. R. Civ. P., and upon the accompanying Memorandum of Law in Support of Motion for Relief from Order, and a Declaration of Robert Wildes, dated December 28, 2009, and upon the prior proceedings herein, class member and prior lead plaintiff applicant Robert Wildes, by his attorneys, Shalov Stone Bonner & Rocco LLP, on a date and at a time to be set by the Court, will move this Court for an order for relief from the Court's December 21, 2009 Order closing the case and its February 18, 2009 Case Management Order appointing Lead Plaintiff and Lead Counsel in the above-captioned action, and will request that the Court enter an order reopening the case, appointing Movant Wildes as lead plaintiff, designating his counsel, Shalov Stone Bonner & Rocco LLP, as lead counsel for plaintiffs, and setting a schedule for the filing of an amended complaint.

Dated: December 30, 2009

Respectfully submitted,

SHALOV STONE BONNER & ROCCO LLP

By: /s/ Ralph M. Stone

Ralph M. Stone (rstone@lawssb.com)

Patrick L. Rocco (procco@lawssb.com)

485 Seventh Avenue, Suite 1000

New York, NY 10018

Telephone (212) 239-4340

Facsimile (212) 239-4310

Attorneys for Plaintiff-Movant Robert Wildes